IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| LG Philips LCD Co., |) | C.A. No.: 04-343-JJF |
|---|---|----------------------|
| Plaintiff, |) | JURY TRIAL DEMANDED |
| V. |) | |
| Tatung Co., Tatung Company of America Inc., and Viewsonic Corp. |) | |
| Defendants |) | |

Declaration of Valerie W. Ho

- I, Valerie W. Ho, declare:
- 1. I am a shareholder of Greenberg Traurig, LLP, one of the law firms representing Tatung Company and Tatung Company of America. I defended the deposition Kevin Ho, a Tatung Company employee, on March 14, 2007.
- 2. During the course of Mr. Ho's deposition, he was asked whether he discussed a particular subject (discounts to HP for product promotion) with me during a break. In fact, there had been no substantive discussions between Mr. Ho and me during the break. Although the subject that Mr. Christenson inquired about had not been discussed, I was concerned that if Mr. Ho answered the specific question as phrased, LG Philips would claim that the attorney client privilege had been waived. Consequently, I instructed him not to answer the question.
- 3. The questions and answers leading up to my instruction appear starting on page 128, line 1 of the Ho transcript and end on page 130, line 14. A true copy of an except of the rough transcript containing those pages is attached as Exhibit A.

4. Because Mr. Ho was not asked whether there had been consultation with counsel during the break, but rather whether a particular subject had been discussed with counsel, I believe my objection and instruction were proper.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true.

Executed this 19th day of March 2007 in Santa Monica, California.

Valerie W. Ho